

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

IN RE GENWORTH FINANCIAL, INC.,
SECURITIES LITIGATION

Civ. A. No. 3:14-cv-00682-JAG

Hon. John A. Gibney, Jr.

CLASS ACTION

**NOTICE OF FILING MEMORANDUM OF LAW
AND EXHIBITS UNDER SEAL**

Lead Plaintiffs Fresno County Employees' Retirement Association and Her Majesty the Queen in Right of Alberta ("Lead Plaintiffs"), by and through their undersigned counsel of record, hereby give Notice of filing under seal Lead Plaintiffs' Motion To Seal Memorandum Of Law And Exhibits In Support Of Their Motion To Compel Production Of Documents And Opposing Defendants' Request To "Clawback" Non-Privileged Documents and the supporting Declaration of Jonathan Uslander and accompanying exhibits. This filing is being made pursuant to the Stipulated Protective Order entered June 25, 2015 (ECF No. 85).

A motion to seal these documents will be filed shortly.

DATED: October 29, 2015

/s/ Susan R. Podolsky
Susan R. Podolsky (Va. Bar No. 27891)
LAW OFFICES OF SUSAN R. PODOLSKY
1800 Diagonal Road, Suite 600
Alexandria, Virginia 22314
Telephone: (571)366-1702
Facsimile: (703) 647-6009
spodolsky@podolskylaw.com

*Local Counsel for Lead Plaintiffs Her Majesty
the Queen in Right of Alberta and Fresno
County Employees' Retirement Association*

**BERNSTEIN LITOWITZ BERGER
& GROSSMANN LLP**

David R. Stickney (admitted *pro hac vice*)
Jonathan D. Uslander (admitted *pro hac vice*)
Brandon Marsh (admitted *pro hac vice*)
12481 High Bluff Drive, Suite 300
San Diego, California 92130
Telephone: (858) 793-0070
Facsimile: (858) 793-0323
davids@blbglaw.com
jonathanu@blbglaw.com
brandon.marsh@blbglaw.com

*Counsel for Lead Plaintiff Fresno County
Employees' Retirement Association and
Co-Lead Counsel for the Class*

**BLEICHMAR FONTI
TOUNTAS & AULD LLP**

Joseph Fonti (admitted *pro hac vice*)
Javier Bleichmar (admitted *pro hac vice*)
Wilson Meeks (admitted *pro hac vice*)
7 Times Square, 27th Floor
New York, New York 10036
Telephone: (212) 789-1340
Facsimile: (212) 205-3960
jfonti@bftalaw.com
jbleichmar@bftalaw.com
wmeeks@bftalaw.com

*Counsel for Lead Plaintiff Her Majesty the
Queen in Right of Alberta and Co-Lead
Counsel for the Class*

CERTIFICATE OF SERVICE

I hereby certify that on October 29, 2015, I caused the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the email addresses denoted on the Electronic Mail Notice List.

/s/ Susan R. Podolsky
Susan R. Podolsky
Virginia Bar No. 27891
1800 Diagonal Road
Suite 600
Alexandria, VA 22314
Phone: 571-366-1702
Fax: 703-647-6009
spodolsky@podolskylaw.com

Local Counsel for Lead Plaintiffs